

Gregory Keenan (*pro hac vice* pending)
DIGITAL JUSTICE FOUNDATION
81 Stewart Street
Floral Park, New York 11001
(516) 633-2633
gregory@digitaljusticefoundation.org

Andrew Grimm (*pro hac vice* pending)
DIGITAL JUSTICE FOUNDATION
15287 Pepperwood Drive
Omaha, Nebraska 68154
(531) 210-2381
andrew@digitaljusticefoundation.org

Ryan Hamilton (SBN 291349)
HAMILTON LAW LLC
5125 South Durango, Suite C
Las Vegas, Nevada 89113
(702) 818-1818
ryan@hamlegal.com

*Attorneys for Plaintiffs*¹

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

THE ESTATE OF ISABELLA "BELLA"
HERNDON, JOHN HERNDON, J.H., *a minor*,
T.H., *a minor*.

on behalf of themselves and others similarly situated,

Plaintiffs.

V.

NETFLIX INC.,

Defendant.

Case No. 4:21-cv-6561-YGR

**[PROPOSED] Order Granting
Stipulated Request for Order
Changing Time**

Judge: Hon. Yvonne Gonzalez Rogers
Courtroom: 1

¹ Additional counsel, including defense counsel, are listed on the following page.

1 Rory Stevens (admission forthcoming)
2 LAW OFFICE OF RORY L. STEVENS
3 4303 Southwest Cambridge Street
4 Seattle, Washington 98136
5 (206) 850-4444
6 rorylawstevensesq@gmail.com

7 Megan Verrips (*pro hac vice* pending)
8 INFORMATION DIGNITY ALLIANCE
9 P.O. Box 8684
10 101 Southwest Madison Street
11 Portland, Oregon 97207
12 (925) 330-0359
13 megan@informationdignityalliance.org

14 James D. Banker (SBN 317242)
15 DIGITAL JUSTICE FOUNDATION
16 210 Flamingo Road, #424
17 Las Vegas, Nevada 89169
18 (714) 722-5658
19 jimbanker@gmail.com

20 *Attorneys for Plaintiffs*

21 Blanca F. Young (SBN 217533)
22 MUNGER, TOLLES & OLSON LLP
23 560 Mission Street,
24 Twenty Seventh Floor
25 San Francisco, California 94105
26 (415) 512-4000
27 (415) 512-4077 (fax)
28 blanca.young@mto.com

29 Jennifer L. Bryant (SBN 293371)
30 Cory M. Batza (SBN 318612)
31 MUNGER, TOLLES & OLSON LLP
32 350 South Grand Avenue
33 Fiftieth Floor
34 Los Angeles, California 90071
35 (213) 683-9100
36 (213) 687-3702 (fax)
37 jennifer.bryant@mto.com
38 cory.batza@mto.com

39 *Attorneys for Defendant*

1
2 **[PROPOSED] ORDER**
3

4 Having reviewed the Parties' Joint Stipulation, and good cause appearing therefore, the
5 Court sets the following briefing schedules:
6

7

8 1. The briefing schedule for the Motion for Remand / Jurisdictional Discovery, Dkt. 25-26, is
9 to remain as is.
10

11 2. The briefing schedule for the Motion to Strike / Dismiss the First Amended Complaint,
12 Dkt. 28, is the same as for the schedule set for the Motion to Strike / Dismiss the initial
13 complaint, Dkt. 16:
14

15 a. Plaintiffs' Opposition brief is due within 14 days of the Court's ruling on the motion
16 to remand and/or motion for jurisdictional discovery, whichever is later;
17 b. Defendant's Reply brief is due within 21 days of Plaintiffs' Opposition brief.
18

19 3. The hearing for the Motion to Strike / Dismiss the First Amended Complaint currently set
20 for November 16, 2021, is hereby taken off calendar.
21

22 4. This schedule is without prejudice to Plaintiffs seeking an additional extension of time if the
23 Court allows jurisdictional discovery.
24

25 5. This Stipulation is without prejudice to Defendant or Plaintiffs seeking all appropriate relief
26 in connection with Plaintiffs' Motion for Remand / Jurisdictional Discovery.
27

28 PURSUANT TO STIPULATION, IT IS SO ORDERED.
29

30
31 October 21, 2021
32

33 Date
34

35 
36 YVONNE GONZALEZ ROGERS
37 United States District Judge
38